

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS, LLC, and STEVEN BARLOW,)	
)	
Plaintiffs/Counterclaim Defendants,)	
)	
v.)	
)	
I JIAN LIN and ENCOMPASS COMMUNICATIONS, INC.,)	
)	
Defendants/Counterclaim Plaintiffs,)	C.A. No. 1:16-cv-11914-LTS
)	
v.)	
)	
VALENTIN DAVID GURVITZ, ESQ., BOSTON LAW GROUP, P.C., and SONYA LIVSHITS,)	
)	
Counterclaim Defendants.)	

UNOPPOSED MOTION TO FILE OVERSIZED MEMORANDUM OF LAW

Counterclaim Defendants Valentin Gurvits and Boston Law Group, P.C.
(collectively, the “BLG Parties”) respectfully move for leave to file a 29-page
memorandum of law in support of their Consolidated Motion to Dismiss Counterclaims. A
true and accurate copy of the proposed Memorandum of Law is attached hereto as Exhibit

1. In support of this Motion, the BLG Parties state as follows:

1. The Counterclaim in this case consists of 100 pages, with 16 counts, spread
over 341 paragraphs, along with an additional 369 pages of exhibits. Nine of the Counts
are aimed at the BLG Parties.

2. The BLG Parties' Memorandum of Law is based not only upon Fed. R. Civ. P. 12(b), but also Rules 8 and 9(b) and upon Massachusetts' Anti-SLAPP statute, G.L. c. 231, §59H.

3. Given the sheer volume of the Counterclaims being responded to, and the number of arguments necessarily raised, the additional space is necessary to fully present the Court with the factual and legal points required to consider the BLG Parties' arguments.

4. None of the other Parties to this action object to the allowance of this motion and no party will be prejudiced if the motion is allowed.

Respectfully submitted,
Valentin Gurvits and Boston Law Group, P.C.
By their attorney,

/s/ Evan Fray-Witzer
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Dated: January 30, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 30, 2017.

/s/ Evan Fray-Witzer

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I, Evan Fray-Witzer, hereby certify that, prior to filing this motion, I conferred with counsel for the Lin Defendants in an attempt to narrow or resolve the issues raised herein.

/s/ Evan Fray-Witzer